



COMDTINST 16475.5

MAR - 6 1996

COMMANDANT INSTRUCTION 16475.5

Subj: ENVIRONMENTAL INITIAL ASSESSMENT SURVEY (IAS) PROGRAM

Ref: (a) COMDT (G-ECV) ltr of 17 Feb 95, IAS Program
(b) 40 CFR 300.420, Chapter 1 (7-1-94 Edition)
(c) 42 U.S.C. 9620(h)

1. PURPOSE. This instruction establishes policies, procedures, and responsibilities for the Coast Guard Environmental Initial Assessment Survey (IAS) program that was outlined in reference (a).
2. ACTION. District commanders, commanders of maintenance and logistics commands, commanding officers of Headquarters units, commanding officers of civil engineering units, and commanding officers of all shore units affected shall assist with the provisions of this instruction.
3. DISCUSSION. It is CG policy to undertake an IAS within a 10-year time frame at all currently and formerly occupied CG facilities located in the United States. An IAS is considered a Preliminary Assessment, an initial step within the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) to differentiate CG sites that pose little or no potential threat to human health and the environment from those sites that warrant further investigation as per reference (b). The IAS is also considered a Facility Assessment under the Resource Conservation and Recovery Act (RCRA) to determine the need for a Corrective Measure Study. Additionally, the IAS program is to fulfill public-right-to-know requirements, and to facilitate real estate transfers as per reference (c). Due to CG specific conditions, the IAS scope of work will be designed to encompass all the overlapping requirements. Once the IAS identifies action areas and sets priorities, long term funding requirements can be established for cleanups.

4. PROCEDURES. The IAS program will:
 - a. Delineate Coast Guard sites that pose little or no potential threat to human health and the environment from those sites that warrant further investigation.
 - b. Review historical waste generation and disposal practices and types of hazardous substances (i.e., contaminants and hydrocarbons as defined by CERCLA and RCRA) associated with the site.
 - c. Investigate potential off-site migration pathways and affected media as well as comprehensive survey of target receptors.
 - d. Obtain comprehensive information of the site and surrounding areas including hydrogeologic and geologic characteristics.
 - e. Conduct a site survey to review for any past, present or future areas of hazardous substance release.
 - f. Develop a report detailing all findings and recommendations.
 - g. Develop a numerical scoring system for the site that is compatible with the scoring done by Preliminary Assessments.
 - h. Develop a user-friendly database that contains IAS information.
5. RESPONSIBILITIES. The responsibility and authority associated with the implementation of the IAS program are delegated to FDCCLANT. At the beginning of each fiscal year, FDCCLANT will coordinate with MLCs, CEUs, and HQ units to develop a list of sites to be surveyed and to submit the list to Headquarters Environmental Management Division, Commandant (G-SCV-3) for prioritization and approval, based on funding availability. The IAS will also support recommendations, if warranted, for a Site Investigation project that may require complex technical and contractual efforts. If the cost for such a project is less than \$200,000, the responsible CEU may undertake the project. If the cost is \$200,000 or more, FDCCLANT will consult with the responsible MLC, CEU, or FDCCPAC as appropriate prior to proceeding.

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